

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (TRENTON)

Caption in Compliance with D.N.J. LBR 9004-1(b)
2017-2058

Pincus Law Group, PLLC
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ATTORNEYS FOR ALLIED MORTGAGE
GROUP, INC. C/O BSI FINANCIAL SERVICES

In Re:

MICHAEL SEIDL

DEBTOR

Case No.: 20-20152

Chapter 13

Hearing Date: 01/05/21

Judge: Chief Judge Michael B. Kaplan

NOTICE OF MOTION FOR ORDER
VACATING AUTOMATIC STAY AS TO REAL PROPERTY

Attorneys for ALLIED MORTGAGE GROUP, INC. C/O BSI FINANCIAL SERVICES (“Movant”) hereby moves this Court for relief from the automatic stay pursuant to 11 U.S.C. Section 362(d), with respect to certain real property of the Debtors having an address of **14 Grace Drive, Hamilton, NJ 08610** (the “Property”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to vacate the automatic stay as it relates to the property commonly known as **14 Grace Drive, Hamilton, NJ 08610**, currently owned by the Debtor and

made part of this bankruptcy, or if you want the court to consider your views on the motion, then on or before **December 29, 2020**, you or your attorney must:

1. File with the court a written request for a hearing, and an answer explaining your position at: Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must also mail a copy to the following:

PINCUS LAW GROUP, PLLC 2929 ARCH STREET SUITE 1700 PHILADELPHIA, PA 19104 484-575-2201 ATTORNEYS FOR MOVANT, ALLIED MORTGAGE GROUP, INC. C/O BSI FINANCIAL SERVICES	Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650
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2. Attend the hearing scheduled for, **01/05/2021**, at **09:00 AM** in Courtroom **#8** of the U.S. BANKRUPTCY COURT, 402 East State Street, Trenton, NJ 08680.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection, and may enter an order granting that relief.

The facts and circumstances supporting this Motion are set forth in the Certification Regarding Post Petition Payment History filed contemporaneously herewith (the "Certification").

Movant seeks relief from the automatic stay for the following reasons:

Motion for Relief from Stay

Post-confirmation payments required by the confirmed plan have not been made to Movant.

Movant requests the following relief:

1. Relief from the stay allowing Movant (and any successors or assigns) to proceed under applicable non-bankruptcy law to enforce its remedies to foreclose upon and obtain possession of the Property.

2. For such other relief as the Court deems proper.

Statement of Non-Necessity of Brief: The Movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

Respectfully submitted,

Dated: 11/30/2020

PINCUS LAW GROUP, PLLC

By: /s/ Nicole LaBletta
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ORDER VACATING STAY

The relief set forth on the following page is hereby **ORDERED**.

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Debtor: MICHAEL SEIDL

Case No. 20-20152 MBK

Caption of Order: ORDER VACATING AUTOMATIC STAY

Upon the motion of Pincus Law Group, PLLC, attorneys for ALLIED MORTGAGE GROUP, INC. C/O BSI FINANCIAL SERVICES under Bankruptcy Code section 362(a) and Bankruptcy Code section 1301 for relief from the automatic stay as to certain property as hereinafter set forth, and for cause shown, it is

ORDERED that the automatic stay is vacated to permit the Movant to institute or resume and prosecute to conclusion one or more actions in the court(s) of appropriate jurisdiction to pursue the Movant's rights in the following:

Real Property more fully described as:

14 Grace Drive, Hamilton, NJ 08610

It is further ORDERED that the Movant may join the Debtor, and any trustee appointed in this case as defendants in its action(s) irrespective of any conversion to any other chapter of the Bankruptcy Code.

The Movant shall serve this order on the Debtor, any trustee and any other party who entered an appearance on the Motion.